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Attorneys for Defendant RAMON ROBLEDO GARCIA

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAMON ROBLEDO GARCIA,

Defendant.

Case No.: 2:23-CR-000314-DAD

STIPULATION AND ORDER TO  
CONTINUE JUDGMENT AND  
SENTENCING HEARING

**STIPULATION**

Plaintiff, United States of America, by and through its counsel of record, and Defendant Ramon Robledo Garcia, by and through her counsel of record, hereby stipulate as follows:

1. On January 23, 2024, Defendant pled guilty to the sole count of the Information and the matter was referred to the Probation Office for preparation of a probation investigation report.
2. The matter is presently set for judgment and sentencing on September 17, 2024.
3. Defense notified the Government of the need for additional time to gather, analyze and present information relevant to the Court's consideration of the 18 U.S.C. 3553(a) factors before the imposition of sentence. Having considered defense counsel's request, the

Government has no opposition to the requested date. Similarly, Probation Officer Miranda Lewis of US Probation also has no opposition to this request.

4. Therefore, by this stipulation, Defense respectfully requests that this Court continue the date for judgment and sentencing hearing until January 7, 2025.
5. Defense also kindly requests that all dates pertinent to the preparation of the Presentence Investigation Report be adjusted accordingly to reflect the new sentencing date of January 7, 2025, as follows:

- a. Judgment and Sentencing: January 07, 2025
- b. Reply, or Statement of Non-Opposition: December 31, 2024
- c. Formal Objections to the Presentence Report shall be filed with the Court and served on the Probation Officer and Opposing Counsel no later than: December 24, 2024
- d. Final Presentence Report December 17, 2024
- e. Counsel's informal written objections shall be delivered to the Probation Officer and Opposing Counsel no later than: December 10, 2024
- f. Draft Presentence Report shall be disclosed to counsel no later than: Already Disclosed

6. Because the Defendant has pled guilty, the provisions of the Speedy Trial Act do not apply to this request.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: September 9, 2024

PHILLIP A. TALBERT  
United States Attorney

\_\_\_\_\_/s/ David W. Spencer\_\_\_\_\_  
DAVID W. SPENCER  
Assistant United States Attorney

1 Dated: September 9, 2024

\_\_\_\_\_/s/ Mary Ann Bird\_\_\_\_\_  
MARY ANN F. BIRD  
Attorney for RAMON ROBLEDO GARCIA

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7 **FINDINGS AND ORDER**

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9 The Court hereby continues the judgment and sentencing hearing to January 7, 2025, at  
10 9:30 A.M. All dates previously set for the preparation of the Presentence Investigation Report  
11 and for the filing of documents with the Court are reset consistent with judgment and sentencing  
12 hearing date of January 7, 2025.  
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14 IT IS SO ORDERED.

15 Dated: September 10, 2024 *Dale A. Drozd*  
16 DALE A. DROZD  
17 UNITED STATES DISTRICT JUDGE  
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